

ROBERT P. VARIAN (STATE BAR NO. 107459)  
CHARLES J. HA (WA Bar No. 34430 (*pro hac vice*))  
DAVID KEENAN (WA Bar No. 41359 (*pro hac vice*))  
CHRISTINE M. SMITH (STATE BAR NO. 267929)  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
The Orrick Building  
405 Howard Street  
San Francisco, California 94105-2669  
Telephone: (415) 773-5700  
Facsimile: (415) 773-5759  
Email: rvarian@orrick.com

JULIA HARUMI MASS (SBN 189649)  
MICHAEL T. RISHER (SBN 191627)  
MEGAN E. SALLOMI (SBN 300580)  
AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
OF NORTHERN CALIFORNIA  
39 Drumm Street  
San Francisco, CA 94111  
Telephone: (415) 621-2493  
Facsimile: (415) 255-8437  
Email: jmass@aclunc.org

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

Case No.: 13-cv-05878 EMC

**DECLARATION OF JULIA HARUMI  
MASS IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PERMISSION TO  
WITHDRAW THE ACLU-NORTHERN  
CALIFORNIA, THE ACLU-NATIONAL  
PRISON PROJECT, AND ORRICK,  
HERRINGTON & SUTCLIFFE LLP AS  
COUNSEL FOR LOURDES  
HERNANDEZ-TRUJILLO**

CLASS ACTION

1 I, Julia Harumi Mass, declare as follows:

2 1. I am a staff attorney at the American Civil Liberties Union Foundation of  
3 Northern California (“ACLU”) and one of the lawyers representing named Plaintiffs Audley  
4 Barrington Lyon, Jr. and José Elizandro Astorga-Cervantes and the class of all current and future  
5 immigration detainees who are or will be held by Immigration and Customs Enforcement in  
6 Contra Costa, Sacramento, and Yuba Counties (collectively, “Plaintiffs”) in the above captioned  
7 matter. I submit this declaration in support of Plaintiffs’ Motion for Permission to Withdraw the  
8 ACLU-Northern California, the ACLU-National Prison Project, and Orrick, Herrington &  
9 Sutcliffe LLP as Attorneys of Record for Lourdes Hernandez-Trujillo.

10 2. I last spoke with Ms. Hernandez-Trujillo on November 17, 2014, during a  
11 meeting in which I advised Ms. Hernandez-Trujillo that she would be required to respond to  
12 outstanding discovery requests for information relating to her as well as a request to take her  
13 deposition.

14 3. During the November 17, 2014 meeting, Ms. Hernandez-Trujillo and I scheduled  
15 a follow-up meeting for December 17, 2014 to finalize her discovery responses. Ms. Hernandez-  
16 Trujillo did not show up to this meeting.

17 4. From late November 2014 until February 2015, I directed a fellow at the ACLU,  
18 Megan Sallomi, to call and email Ms. Hernandez-Trujillo. Ms. Sallomi told me that she  
19 repeatedly called and emailed but has not been able to reach Ms. Hernandez-Trujillo.

20 5. On December 23, 2014, I directed Ms. Sallomi to mail a letter to Ms. Hernandez-  
21 Trujillo to the two mailing addresses that Plaintiffs’ counsel has on file for her via U.S. mail,  
22 reminding Ms. Hernandez-Trujillo of her obligations as a Lead Plaintiff in this case.

23 6. On January 30, 2015, I wrote a letter to Ms. Hernandez-Trujillo, notifying her that  
24 she would be dismissed from this case if she did not contact counsel by February 5, 2015. My  
25 assistant mailed the letter to the two mailing addresses that we have on file for her via U.S. mail,  
26 and Ms. Sallomi sent a copy to Ms. Hernandez-Trujillo via email.

27 7. As of the date of this filing, I have not received any response or communication  
28 from Ms. Hernandez-Trujillo since the November 17, 2014 meeting.

9. On March 3, 2015, Defendants' counsel informed me that, under the circumstances, Defendants agreed to the voluntary dismissal of Ms. Hernandez-Trujillo's claims and Plaintiffs' counsel's withdrawal of representation from Ms. Hernandez-Trujillo.

/s/ Julia Harumi Mass  
JULIA HARUMI MASS